

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:

YELLOW CORPORATION, *et al.*,<sup>1</sup>

Debtors.

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Chapter 11

Case No. 23-11069 (CTG)

(Jointly Administered)

Hearing Date: January 22, 2024 at 2:00 p.m. (ET)  
Objection Deadline: January 2, 2024 at 4:00 p.m. (ET)

**NOTICE OF HEARING ON FIRST INTERIM FEE APPLICATION  
REQUEST OF KPMG LLP**

**PLEASE TAKE NOTICE** that on December 12, 2023, KPMG, audit services provider for the above-captioned debtors and debtors in possession (the “Debtors”), filed the *First Interim Fee Application Request of KPMG LLP* (the “Application”) seeking fees in the amount of \$148,766.00 and reimbursement of actual and necessary expenses in the amount of \$0.00. A copy of the Application is attached hereto.

**PLEASE TAKE FURTHER NOTICE** that any response or objection to the Application, if any, must be made in writing and filed with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3<sup>rd</sup> Floor, Wilmington, Delaware 19801 (the “Court”) on or before **January 2, 2024 at 4:00 p.m. (ET)**.

The Application is submitted pursuant to the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II)*

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<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of the Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

*Granting Related Relief*, entered on September 13, 2023 [Docket No. 519] (the “Administrative Order”).

**PLEASE TAKE FURTHER NOTICE** that at the same time, you must also serve a copy of the response or objection upon: (a) the Debtors, Yellow Corporation, 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211, Attn.: General Counsel; (b) counsel to the Debtors (i) Kirkland & Ellis LLP, 300 North LaSalle, Chicago, Illinois, 60654, Attn.: Whitney Fogelberg ([whitney.fogelberg@kirkland.com](mailto:whitney.fogelberg@kirkland.com)) and Rob Jacobson ([Rob.Jacobson@kirkland.com](mailto:Rob.Jacobson@kirkland.com)) (ii) Kirkland & Ellis LLP, 601 Lexington Avenue, New York, New York 10022, Attn.: Allyson B. Smith ([allyson.smith@kirkland.com](mailto:allyson.smith@kirkland.com)); and (iii) Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, PO Box 8705, Wilmington, Delaware 19801, Attn.: Laura Davis Jones ([ljones@pszjlaw.com](mailto:ljones@pszjlaw.com)), Timothy P. Cairns ([tcairns@pszjlaw.com](mailto:tcairns@pszjlaw.com)), Peter J. Keane ([pkeane@pszjlaw.com](mailto:pkeane@pszjlaw.com)), and Edward Corma ([ecorma@pszjlaw.com](mailto:ecorma@pszjlaw.com)); (c) the Office of the United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801, Attn.: Jane Leamy ([jane.m.leamy@usdoj.gov](mailto:jane.m.leamy@usdoj.gov)) and Richard Shepacarter ([richard.shepacarter@usdoj.gov](mailto:richard.shepacarter@usdoj.gov)); (d) counsel to the Committee (i) Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, Bank of America Tower, New York, NY 10036-6745 US, Attn.: Philip C. Dublin ([pdublin@akingump.com](mailto:pdublin@akingump.com)), Meredith A. Lahaie ([mlahaie@akingump.com](mailto:mlahaie@akingump.com)), and Kevin Zuzolo ([kzuzolo@akingump.com](mailto:kzuzolo@akingump.com)) and (ii) co-counsel to the Committee, Benesch Friedlander Coplan & Aronoff LLP, 1313 North Market Street, Suite 1201, Wilmington, DE, 19801, Attn.: Jennifer R. Hoover ([jhoover@beneschlaw.com](mailto:jhoover@beneschlaw.com)) and Kevin M. Capuzzi ([kcapuzzi@beneschlaw.com](mailto:kcapuzzi@beneschlaw.com)); (e) counsel to the Junior DIP Lender, (i) Quinn Emmanuel Urquhart & Sullivan, 865 S. Figueroa St., 10th Floor, Los Angeles, CA 90017, Attn.: Eric Winston ([ericwinston@quinnemanuel.com](mailto:ericwinston@quinnemanuel.com))

and 51 Madison Avenue, 22nd Floor, New York, NY 10010, Attn: Susheel Kirpalani ([susheelkirpalani@quinnemanuel.com](mailto:susheelkirpalani@quinnemanuel.com)), and (ii) Ropes & Gray LLP, 191 North Wacker Drive, 32nd Floor, Chicago, IL 60606, Attn: Lucas S. Smith ([Luke.Smith@ropesgray.com](mailto:Luke.Smith@ropesgray.com)) and 1211 Avenue of the Americas, New York, NY 10036, Attn: Natasha S. Hwangpo ([Natasha.Hwangpo@ropesgray.com](mailto:Natasha.Hwangpo@ropesgray.com)); (f) counsel to the Junior DIP Agent, Holland & Knight LLP, 50 N. Riverside Plaza, Suite 2700, Chicago, IL 60606, Attn.: Joshua M. Spencer ([Joshua.Spencer@hkllaw.com](mailto:Joshua.Spencer@hkllaw.com)) and Phillip W. Nelson ([Phillip.Nelson@hkllaw.com](mailto:Phillip.Nelson@hkllaw.com)); (g) counsel to the B-2 Lenders, White & Case LLP, 1221 Avenue of the Americas, New York, NY 10020 Attn.: Scott Greissman ([sgreissman@whitecase.com](mailto:sgreissman@whitecase.com)), Elizabeth Feld ([efeld@whitecase.com](mailto:efeld@whitecase.com)), and Andrew Zatz ([azatz@whitecase.com](mailto:azatz@whitecase.com)); (h) counsel to the Prepetition ABL Agent, Choate, Hall & Stewart LLP, Two International Place, Boston, MA 02110, Attn.: Kevin Simard ([ksimard@choate.com](mailto:ksimard@choate.com)) and Hampton Foushee ([hfoushee@choate.com](mailto:hfoushee@choate.com)); (i) counsel to the B-2 Agent, Holland & Knight LLP, 50 N. Riverside Plaza, Suite 2700, Chicago IL 60606, Attn.: Joshua M. Spencer ([Joshua.Spencer@hkllaw.com](mailto:Joshua.Spencer@hkllaw.com)) and Phillip W. Nelson ([Phillip.Nelson@hkllaw.com](mailto:Phillip.Nelson@hkllaw.com)); (j) counsel to the Prepetition UST Tranche A Agent, Hogan Lovells US LLP, 390 Madison Avenue, New York, NY 10017, Attn: Ronald J. Silverman ([ronald.silverman@hoganlovells.com](mailto:ronald.silverman@hoganlovells.com)) and Christopher R. Bryant ([chris.bryant@hoganlovells.com](mailto:chris.bryant@hoganlovells.com)); (k) counsel to the Prepetition UST Tranche B Agent, Hogan Lovells US LLP, 390 Madison Avenue, New York, NY 10017, Attn.: Ronald J. Silverman ([ronald.silverman@hoganlovells.com](mailto:ronald.silverman@hoganlovells.com)) and Christopher R. Bryant ([chris.bryant@hoganlovells.com](mailto:chris.bryant@hoganlovells.com)); (l) counsel to the United States Department of the Treasury, Arnold & Porter Kaye Scholer LLP, 70 West Madison Street, Suite 4200, Chicago, Illinois 60602, Attn: Michael Messersmith ([michael.messersmith@arnoldporter.com](mailto:michael.messersmith@arnoldporter.com)), 250 West 55th

Street, New York, NY 10019, Attn: Benjamin Mintz ([benjamin.mintz@arnoldporter.com](mailto:benjamin.mintz@arnoldporter.com)), and 601 Massachusetts Ave., N.W., Washington, DC 20001, Attn.: Rosa Evergreen ([rosa.evergreen@arnoldporter.com](mailto:rosa.evergreen@arnoldporter.com)); (m) the United States Department of Justice, 1100 L St NW Rm 7102, Washington, DC 20005-4035, Attn.: I-Heng Hsu ([I-Heng.Hsu@usdoj.gov](mailto:I-Heng.Hsu@usdoj.gov)) and Crystal Geise ([Crystal.Geise@usdoj.gov](mailto:Crystal.Geise@usdoj.gov)).

**PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE APPLICATION WILL BE HELD ON JANUARY 22, 2024 AT 2:00 P.M (ET) BEFORE THE HONORABLE CRAIG T. GOLDBLATT, UNITED STATES BANKRUPTCY COURT JUDGE, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 3RD FLOOR, COURTROOM NO. 7, WILMINGTON, DELAWARE 19801. ONLY OBJECTIONS MADE IN WRITING AND TIMELY FILED WILL BE CONSIDERED BY THE BANKRUPTCY COURT AT SUCH HEARING.**

**PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.**

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Dated: December 12, 2023  
Wilmington, Delaware

*/s/ Peter J. Keane*

Laura Davis Jones (DE Bar No. 2436)  
Timothy P. Cairns (DE Bar No. 4228)  
Peter J. Keane (DE Bar No. 5503)  
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*Co-Counsel for the Debtors and Debtors in Possession*